

IN THE UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF OKLAHOMA

W. A. DREW EDMONDSON, in his)
capacity as ATTORNEY GENERAL)
OF THE STATE OF OKLAHOMA and)
OKLAHOMA SECRETARY OF THE)
ENVIRONMENT C. MILES TOLBERT,))
in his capacity as the)
TRUSTEE FOR NATURAL RESOURCES))
FOR THE STATE OF OKLAHOMA,)
)
Plaintiff,)
)
vs.) 4:05-CV-00329-TCK-SAJ
)
TYSON FOODS, INC., et al,)
)
Defendants.)

- - - - -
THE VIDEOTAPED DEPOSITION OF
VALERIE HARDWOOD, PhD, produced as a witness on
behalf of the Defendants in the above styled and
numbered cause, taken on the 18th day of July, 2008,
in the City of Tulsa, County of Tulsa, State of
Oklahoma, before me, Lisa A. Steinmeyer, a Certified
Shorthand Reporter, duly certified under and by
virtue of the laws of the State of Oklahoma.

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I N D E X

W I T N E S S

P A G E

VALERIE HARWOOD

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1 A Thank you. I know it was quantifiable in 16
2 of them, but -- so there are several here, one, two,
3 three, four in which it is below detection limit.

4 Q Okay. What does -- this is a terminology
5 question. What does EOF SPREAD mean as distinct 02:08PM
6 from the samples at the top which are just EOF; do
7 you know the sample naming?

8 A You know, I was actually always confused about
9 that. I had to go and ask CDM every time I was
10 looking at the samples, so I don't know. 02:08PM

11 Q Okay. So you don't remember the answer.
12 Would it surprise you to not find -- to not find the
13 PCR sequence in edge of field samples?

14 A In some cases I know that the litter spreading
15 had occurred some weeks or months prior to the 02:08PM
16 sampling. So with that knowledge, I'm not surprised
17 that we don't find it sometimes.

18 Q If you look at the numbers of gene copies
19 identified at the beginning of the first page of
20 Exhibit 12 here in the edge of field samples, they 02:09PM
21 range from to the 4th up to the 7th; do you see
22 that?

23 A I see that.

24 Q Does that spread surprise you at all?

25 A No, again, because depending on the amount of 02:09PM

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